

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ALEXA BOIDI and IVAN MILOSAVLJEVIC,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 22-cv-01921
)	
RICHLAND REFRIGERATED SOLUTIONS,)	
LLC and SHIMELES TESHAYE,)	
)	
Defendants)	

NOTICE OF REMOVAL

NOW COMES, RICHLAND REFRIGERATED SOLUTIONS, LLC AND SHIMELES TESHAYE and by filing this Notice of Removal and related papers, removes this lawsuit from the Circuit Court of Cook County, Illinois to this Court pursuant to 28 U.S.C. §§ 1332, 1441 and 1446. In support of removal, Defendants state:

1. Plaintiffs commenced this action in the First Municipal District of the Circuit Court of Cook County, Illinois, on or about February 24, 2022, by filing their Complaint at Law. Defendants, RICHLAND REFRIGERATED SOLUTIONS, LLC and SHIMELES TESHAYE (Collectively “Defendants”) were both served on March 18, 2022. A copy of the Complaint and any other papers filed in State Court are attached collectively as Exhibit A.

2. Pursuant to 28 U.S.C. § 1446(b)(3), Defendants have 30 days from the service of the Complaint to seek removal of the action to this Court, which in this case would be until April 18, 2022. Accordingly, this Notice of Removal is timely filed.

3. Plaintiff seeks damages allegedly caused by a motor vehicle collision that occurred on February 29, 2020 in the City of Madison, Madison County, Illinois between a semi-tractor trailer driven by Teshaye and Plaintiffs vehicle. *See* Exhibit A, Complaint at Law.

4. The First Municipal District for the Circuit Court of Cook County is located within the Northern District of Illinois, Eastern Division. Therefore, removal to this Court satisfies the venue requirements of 28 U.S.C. § 1446(a).

5. Upon information and belief, at all relevant times, Plaintiff, ALEXA BODI (“Bodi”), was a resident of Las Vegas, Nevada.

6. Upon information and belief, at all relevant times, Plaintiff, IVAN MILOSAVLJEVIC (“Milosavljevic”), was a resident of Las Vegas, Nevada.

7. Defendant, RICHLAND REFRIGERATED SOLUTIONS, LLC is a Limited Liability Company organized under the laws of Minnesota with its principal place of business located in Ham Lake, Minnesota. The sole member and manager of RICHLAND REFRIGERATED SOLUTIONS, LLC, Akil Ibrahim, resides in Minnesota. Therefore, RICHLAND REFRIGERATED SOLUTIONS, LLC is a citizen of Minnesota.

8. Defendant, SHIMELES TESFAYE, resides in Loganville, Georgia. Therefore, SHIMELE TESFAYE is a citizen of Georgia.

9. To date Plaintiff Bodi has incurred a total of \$82,731.28 in medical expenses as evidenced by the demand letter sent to Defendants on April 7, 2022, and attached as Exhibit B.

10. To date Plaintiff Milosavljevic has incurred a total of \$28,621.32 in medical expenses as evidenced by the demand letter sent to Defendants on April 7, 2022, and attached as Exhibit C.

11. Plaintiffs seek damages in excess of \$75,000, which satisfies the jurisdictional amount-in-controversy requirement of 28 U.S.C. § 1332(a).

12. Therefore, this Court has original subject matter jurisdiction over this action based on § 1332(a) because there is complete diversity of citizenship between all opposing parties and the amount in controversy exceeds \$75,000.

13. Defendants reserve the right to amend or supplement this Notice of Removal and specifically reserves all defenses.

14. The written notice required by 28 U.S.C. § 1446(d) will be promptly filed in the First Municipal District for the Circuit Court of Cook County, Illinois and promptly served on Plaintiffs.

Dated: April 14, 2022

Respectfully submitted,

CONNOLLY KRAUSE LLC

By: /s/ Michael D. Krause
One of Attorneys for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2022, I electronically filed the foregoing Defendant's Notice of Consent to Removal with the Clerk of the Court through CM/ECF and to be served upon all counsel of record by filing the same with the CM/ECF system.

/s/ Michael D. Krause